



August 1, 2024

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By ECF

Hon. Joseph A. Marutollo, U.S.M.J.
U.S. District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Gilead Sciences, Inc. et al. v. Safe Chain et al., No. 21-cv-4106 (AMD) (JAM)

Dear Judge Marutollo:

Plaintiffs (collectively, “Gilead”) write pursuant to the Court’s July 2, 2024 Order for a “joint” status report from the parties. Gilead solicited from all Defendants any additional issues to be addressed in this letter. Gilead did not receive any responses.

I. Gilead Updates

On July 29, 2024, counsel for Mohammad Etminan and Everything Pharmacy Related II, Inc. d/b/a Total Remedy and Prescription Center ("Total Remedy") informed the parties that Total Remedy will not depose Gilead’s damages expert, Dr. Gregory Bell. No other Defendant sought to depose Dr. Bell. Expert discovery is now closed.

On July 31, 2024, Gilead filed a motion to compel certain third parties regarding its contempt discovery for Peter Khaim’s violations of the Asset Freeze Order. Dkt. No. 1408. That motion is currently pending. Gilead has otherwise completed its requests for discovery regarding Khaim’s contempt, pursuant to the Court’s June 28, 2024 Order.

Respectfully submitted,

/s/ Timothy A. Waters

Timothy A. Waters

cc: All counsel of record (via ECF)